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Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION**

TRACY CAEKAERT, and CAMILLIA)
MAPLEY,)
)
Plaintiffs,)
)
vs.)
)
WATCHTOWER BIBLE AND TRACT)
SOCIETY OF NEW YORK, INC., and)
WATCH TOWER BIBLE AND TRACT)
SOCIETY OF PENNSYLVANIA,)
)
Defendants,)
)

Case No. CV-20-52-BLG-SPW

**PLAINTIFFS' NOTICE RE:
DEPOSITIONS OF SHUSTER,
BREAUX, AND SMALLEY**

Plaintiffs respectfully provide the following Notice:

1. On May 17, 2023, Plaintiffs noticed the depositions of witnesses Allen Shuster, Gary Breaux, and Gene Smalley.

2. Defendant WTNY objects to the depositions and motions are currently pending before the Court.
3. On August 17, 2023, WTNY stated that it would not produce the witnesses for deposition unless ordered to do so by the Court.
4. Because WTNY has stated that it will not produce the witnesses for the noticed depositions, Plaintiffs' counsel will not be traveling to New York to take them as presently noticed.
5. Should the Court rule in Plaintiffs' favor and permit the depositions taken they will be rescheduled to provide adequate time for preparation and travel.

DATED this 17th day of August, 2023.

By: /s/ Ryan Shaffer
Ryan R. Shaffer
MEYER, SHAFFER & STEPANS PLLP
Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

Pursuant to Local Rule 1.4, this document has been served on all parties via electronic service through the Court's Case Management/Electronic Case Filing (CM/ECF) system.

By: /s/ Ryan Shaffer
Ryan R. Shaffer
MEYER, SHAFFER & STEPANS PLLP

Attorneys for Plaintiffs